

WALTER E. DEUCHLER ASSOCIATES INC.

Consulting Engineers

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AURORA, ILLINOIS 60506

March 29, 2010

Ms. Dawn Thompson
CMAP Wastewater Committee
Chicago Metropolitan Planning Agency
233 S. Wacker Drive, Suite 800
Sears Tower
Chicago, Illinois 60606

**RE: Illinois American Water Company
WWTP Expansion
Kendall County, Illinois
WEDA Project No. 111-07070-00
Water Quality Review #10-WQ-005**

Dear Ms. Thompson:

On behalf of the Fox Metro Water Reclamation District (FMWRD), we submit the following responses to comments submitted by Illinois American Water Company (ILAWC) to CMAP on March 19, 2010 regarding the Valley Water Reclamation Facility (Valley Marina) Expansion (#10-WQ-005).

FMWRD has been approached by ILAWC to provide wastewater treatment to the Valley Marina service area. These negotiations have been ongoing for approximately two years. FMWRD has proposed a \$10.00/gallon connection fee based on a plant capacity of 0.25 million gallons for a total connection fee of \$2,500,000. The Valley Marina Water Reclamation Facility Improvements Report (January 2010), Section 5, Table 5.03-1 on page 5-9, appears to skew this cost by indicating a connection fee to FMWRD of \$4,200,000.

In negotiations with ILAWC, FMWRD has been quoted a figure by ILAWC of \$4,360,000 for a new wastewater treatment system comprised of a 0.42 mgd oxidation ditch plant with BNR, mechanical screening, UV disinfection system, new aerobic digestion facilities and post aeration. The same Table 5.03-1 compares Liquid Treatment Alternative Costs. Costs shown for Alternatives B-1 through B-4 appear to be much lower than the cost quoted to FMWRD by ILAWC. When reviewing the same table, we noticed that there were no financial costs provided for solids handling and disposal as part of the cost alternatives B-1 through B-4.

While it can be argued that economically it will cost more for FMWRD to treat flow and to provide solids disposal from Valley Marina (although not nearly as high as indicated in the Facility Upgrade Report), it is because FMWRD must meet a much higher level of treatment than a much smaller facility. Therefore, environmentally the quality of wastewater discharged to the Fox River from

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FMWRD would be much better than if Valley Marina continued to operate a separate, smaller wastewater treatment system.

ILAWC has indicated that they would like to wait for the Fox River Study Group (FRSG) to set site specific discharge limits. As an active member of the FRSG, FMWRD can state that promulgation of new discharge limits using FRSG data and modeling is years away. If, Valley Marina would like to wait for these limits, we suggest not approving the expansion of the facility until these limits are set by the IEPA.

ILAWC discussed discharge limits for the Fox River Water Reclamation District (FRWRD) in Elgin. We do not think that FRWRD discharge limits are relevant to this discussion. FMWRD and Valley Marina are within the same segment of the Fox River, FRWRD is not.

Finally, FMWRD as a regional facility, has been a proponent in the last fifteen years of abandoning older, smaller wastewater treatment plants such as the ones which were located in the Villages of Oswego and Sugar Grove and at the Waubonsie Community College. This is consistent with the mission of CMAP for a more regional planning approach in Northeastern Illinois.

FMWRD does not feel that ILAWC has provided an accurate cost comparison of treatment alternatives either for upgrading the Valley Marina Facility or for sending wastewater to FMWRD nor has ILAWC fully considered the environmental benefits of a regional wastewater treatment plant facility. Based on the information provided, we request that you defer a decision on the expansion of Valley Marina Water Reclamation Facility until such time that all costs and benefits are clearly understood by all parties.

Should you have any questions or require additional information relative to this matter, please do not hesitate to contact the undersigned at (630)897-4651.

Very truly yours,

WALTER E. DEUCHLER ASSOCIATES, INC.



Carrie Carter
Project Engineer

CJC/cc

cc: Tom Muth (FMWRD)
Philippe Moreau (WEDA)
John Frerich (WEDA)
Richard Hermann (Illinois American Water Company)